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15 *[Additional counsel listed in signature block]*

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**
19

20 AMANDA HILL, individually and on
Behalf of All Others Similarly Situated,
21 Plaintiff,
22
23 v.
24 QUICKEN LOANS INC.,
25 Defendant.

Case No. 5:19-cv-00163-FMO-SP
**JOINT STIPULATION TO EXTEND
CASE DEADLINES**

1 Pursuant to Local Rule 16-14, Plaintiff Amanda Hill¹ and Defendant Quicken
2 Loans, LLC (f/k/a Quicken Loans, Inc.) (“Quicken Loans”) (together, the “Parties”),
3 hereby submit this joint stipulation requesting that the Court extend all case
4 deadlines (Dkt. No. 87) by four (4) months, with the exception of the settlement
5 conference deadline, which the Parties propose to keep as scheduled for on or before
6 September 8, 2020. As grounds for their motion, the Parties state as follows:

7 1. Presently, Quicken Loans has two motions pending: a motion to
8 compel arbitration filed on April 15, 2019 (Dkt. No. 29) and a motion to dismiss
9 filed on January 31, 2020 (Dkt. No. 79). The Parties expect that the Court’s
10 resolution of these motions may guide remaining discovery.

11 2. While both Parties have diligently pursued discovery to date, more
12 discovery still remains to be completed. However, the COVID-19 pandemic, which
13 accelerated in intensity shortly after the Court set the deadlines for this case on
14 March 6, 2020 (*see* Dkt. No. 87), has understandably caused unanticipated delays to
15 the Parties’ discovery efforts. The Parties are appreciative that “the court is mindful
16 of the ongoing coronavirus pandemic and the measures the Central District of
17 California has undertaken to protect the health and safety of court staff, litigants,
18 and the public.” Dkt. No. 92. Consistent with this understanding, the Parties submit
19 that a brief extension of deadlines will allow the Parties to arrange for alternative
20 means to safely complete discovery given the limitations and prohibitions of person-
21 to-person contact and travel between certain states.

22 3. This is the Parties’ first request to extend or continue case deadlines.

23 Wherefore, the Parties jointly propose that all case deadlines be extended by
24 four (4) months (with the exception of the settlement conference), with new case
25 deadlines entering as follows:

26 ¹ On July 2, 2020, former co-Plaintiff Gale Hyde voluntarily dismissed her claims
27 with prejudice, and Plaintiff Hill is now the sole remaining Plaintiff. *See* Joint
28 Stipulation of Dismissal of Plaintiff Gayle Hyde’s Individual Claims with Prejudice
(Dkt. No. 103).

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Dated: July 8, 2020

By: /s/ Jason A. Ibey (*with permission*)
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